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March 1, 2024

By ECF

Hon. Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York

The deposition dates below are so ordered. The parties' request for a stay is **DENIED**. As stated in the Dkt. 36 order, no further discovery deadline extensions will be granted absent extraordinary circumstances.

Dated: March 5, 2024
New York, New York

Re: Joint Request to Stay Litigation and
Joint Letter re Depositions
Dyson, Inc. v. Kuehne + Nagel, Inc.
d/b/a Blue Anchor America Line
Case No.: 1:23-cv-06818-LGS

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

We represent Plaintiff, Dyson, Inc., and write jointly with counsel for Defendant, Kuehne + Nagel, Inc. d/b/a Blue Anchor America Line ("K+N") (collectively "Parties").

The Parties are in the process of reaching a settlement in principle involving non-parties that, once finalized, would resolve all disputes in this litigation. To preserve resources as the Parties coordinate with non-parties in an effort to globally resolve the claims between them, the Parties request that litigation be stayed until April 30, 2024, and propose to file a status update by April 1, 2024.

In case the Court is not inclined to grant the requested stay, and in response to the Court's February 22 order (ECF no. 36), the Parties plan to conduct depositions on the following dates:

March 14: Scott Copeland, as Rule 30(b)(6) representative of Plaintiff

March 20: Joshua Warner, as Rule 30(b)(6) representative of Defendant

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Hon. Lorna G. Schofield

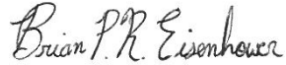
March 1, 2024

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We thank the Court for its consideration of this request and attention to this matter.

Respectfully submitted,

HILL RIVKINS LLP



Brian P. R. Eisenhower

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cc: **By ECF**
All Counsel of Record